

RECORDS CLASSIFICATION FORM FOR REGION V
RCRA RECORDS

Today's Date: 11/4/13

Site Name: Arkema

ID Number: ILD 069 998 078

Date(s) of Documents: 9/12 - 9/13

Type(s) of Document: Enforcement Documents

Quantity of Documents: No. of Box(es) _____ No. of Folder(s): 1

Sensitive: CBI Room N/A Enforcement Sensitive (Red Folder) N/A

Documents can go to Federal Record Center: Yes ☒ No ☐
(Documents from FRC can be recalled in 48-72 hours)

Submitted by: Samie Paulin

Telephone Number: 6-1771

Comments: _____



12840 South Pulaski Road, Alsip, Illinois 60803 / ph: 708-396-3006 / www.arkema.com

September 4, 2013

Certified Mail – Return Receipt Requested

Jamie L. Paulin
U.S. Environmental Protection Agency
Region 5 (LR-8J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: United States Environmental Protection Agency Region 5 ; Notice of Violation
RCRA Compliance Evaluation Inspection-Arkema Emulsion Systems
EPA I.D. No.: ILD 069 998 078

Dear Inspector Paulin:

Attached is a response by the Arkema Inc. Alsip, Illinois facility (Arkema) to the United States Environmental Protection Agency (EPA) Notice of Violation (NOV) dated August 9, 2013, related to a September 26, 2012 RCRA Compliance Evaluation Inspection. Below is an itemized list of the alleged deficiencies in the NOV and Arkema's corresponding responses.

1. EPA Comment:

A generator of hazardous waste must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance. See, 35 IAC§ 722.134(a)(4); 35 IAC§ 725.116(b), (c) (d)(3) & (d)(4) [40 CFR § 262.34(a)(4); 40 C.F.R. § 265.16(b), (c), (d)(3) & (d)(4)].

At the time of the inspection, Arkema's training records did not include documentation showing that new employees completed the training program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste and did not include documentation that facility personnel took part in an annual review of the initial training required.

Arkema did not maintain a written description of the type and amount of both introductory and continuing training that was given to each person at the facility related to hazardous waste management.

Lastly, Arkema did not maintain records that documented the training or job experience, required, had been given to, and completed by, facility personnel.

ARKEMA RESPONSE:

The Arkema Alsip facility conducts the required RCRA training of personnel at the Alsip location related to the storage and handling of Hazardous Waste in two (2) separate programs. The first training course is a general Hazardous Chemical session which provides 'awareness' level training on where Hazardous Wastes are generated and

stored onsite and is required of employees whose job functions do not have any routine involvement with Hazardous Waste at the Alsip site. This training is an annual requirement for these personnel.

The second course is a more detailed training on the Alsip site's Hazardous Waste program and includes topics involving waste identification, waste code classification, proper labeling and manifest requirements, storage limitations and procedures, emergency response actions, proper reporting and documentation and treatment prohibitions among many other items listed in 40 CFR 260-264. This training is provided annually to those personnel who routinely handle or manage Hazardous Waste at the Alsip facility including the Health, Safety and Environmental (HSE) Manager, the Plant Manager, the Environmental Technician and select Operations staff. Arkema acquired this facility on January 25, 2010, and prior to 2012, this training was provided by Arkema in a classroom and in-field setting and documentation is available in hardcopy format.

A training session for this second course, the detailed Hazardous Waste Management topics, was provided on August 18, 2011 to the onsite HSE Manager by an internal resource (Arkema Business Unit HSE Leader) using the classroom and in-field materials discussed above. However, documentation for this training session could not be readily located at the site at the time of the USEPA inspection. Arkema's electronic training database has been updated with this training record.

Since 2012, the Arkema facility began to utilize a software tool called 'TrainingMine' which is a repository for topic-specific training materials as well as uploaded training records for onsite personnel. Also available onsite are electronic personnel files including Job Titles and Job Descriptions which outline which employees have responsibilities involving the storage and handling of Hazardous Waste. At the time of the USEPA inspection (September 2012), the specific element related to Hazardous Waste had yet to be uploaded into TrainingMine for all employees at the site. As a result, the relevant training documentation was not readily locatable during the inspection for the site's HSE Leader for the 2011 calendar year. Promptly after the USEPA inspection, the software was updated to maintain an electronic record confirming that all new employees receive the appropriate training within their first thirty (30) days of hire and annually thereafter, and that their training records are maintained accordingly. This training for all employees was completed in 2012.

The more detailed Annual Hazardous Waste training was conducted in October of 2012 for the HSE Manager, Plant Manager and Environmental Technician. Attached are the training records for the 2010 and 2012 sessions, as well as a printout of the electronic record created in TrainingMine for the 2011 session.

2. EPA Comment:

A generator of hazardous waste must attempt to make arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes. A generator of hazardous waste must also make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the

facility. See, IAC§ 722.134(a)(4); 35 IAC§ 725.137(a)(4) [40 CFR§ 262.34(a)(4); 40 CFR§ 265.37(a)(4)].

Arkema had not made arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

ARKEMA RESPONSE:

Prior to 2012, Arkema had been routinely submitting copies of the Alsip site's Emergency Response Plan (ERP) to the local Hospital (St. Francis Hospital and Health Care), the local Fire Department, Police Department, and the Local Emergency Planning Commission in order to inform the appropriate authorities as to Arkema's onsite chemistry, related hazards, emergency response procedures, evacuation policies and third-party arrangements. This ERP also contains information as to the location of onsite Hazardous Waste at the Alsip facility as well as mitigation measures taken in the event this material is involved with an onsite emergency. There was no formal documentation provided when plans were previously delivered.

The current Arkema Emergency Response Plan was hand delivered to the local St. Francis Hospital and Health Care facility on October 15, 2012. A signed receipt from each of the emergency responding agencies is attached for your reference and is being maintained in Arkema's files.

3 EPA Comment:

A large quantity generator that accumulates hazardous waste on-site and does not meet the conditions for a permit exemption of 35 IAC§ 722.134 and 40 C.F.R. § 262.34 is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See, 35 IAC§ 722.134(a) [40 C.F.R. § 262.34(a)]

Upon failing to meet the conditions and requirements identified in item numbers 1 and 2, listed above, Arkema became an operator of a hazardous waste storage facility. Arkema has not applied for or received a hazardous waste storage permit nor does Arkema have interim status. Arkema's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC§§ 703.121 and 702.123 [adopting 40 C.F.R. §§ 270.1(c) and 270.10].

ARKEMA RESPONSE:

Arkema is confident that the items presented in the August 9, 2013 RCRA Compliance Evaluation Inspection NOV letter have been properly addressed as discussed in this response and that the Arkema facility is compliant with the cited hazardous waste regulations in the Illinois Administrative Code (IAC) and with the corresponding provisions of the United States Code of Federal Regulations (CFR).



12840 South Pulaski Road, Alsip, Illinois 60803 / ph: 708-396-3006 / www.arkema.com

As a general matter, Arkema reserves any rights, privileges and defenses that it may have regarding the NOV and this response. Also, Arkema reserves the right to supplement this response as appropriate.

Please contact me should you have any further questions or require any additional details.

Sincerely,


9/4/13

Glenn Preisler
Plant Manager
Arkema Coating Resins
cell: 262-573-3825

Enclosure;

Alsip Emergency Response Plan receipt signatures,
Training records for William Pedersen

cc: Tim Gaughan, ACR Cary
Jean-Marie Cencetti, Arkema KOP

MyLearning

Certificate of Completion

This will certify that

WILLIAM PEDERSEN

successfully completed

RCRA Annual Federal Training (US00010)

on 1/28/2010 8:46:30

LG 2/4/2010



Pedersen; Bill

has successfully passed the training course

ALSP - RCRA (Resource Conservation and Recovery Act)

Course Objectives/Description

Passing Score: 100%

Date Training Completed: 08/18/2011

100

100



Pedersen; Bill

has successfully passed the training course

ALSP - RCRA (Resource Conservation and Recovery Act)

Course Objectives/Description

Passing Score: n/a

Date Training Completed: 10/16/2012

Alsip Emergency Response Plan

Alsip RCRA Contingency Plan

This document demonstrates only the receipt of the booklet referenced above.

Alsip Fire Department

Robert Ricker
Name (print)

[Signature]
Signature

Alsip Police Department

[Signature]
Name (print)

[Signature]
Signature

St. Francis Hospital and Health Care

LINDA BREITBARTH
Name (print)

[Signature]
Signature

Thank you,

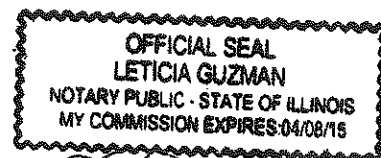
Wm. D PEDERSEN

Sr. HES Manager
708.936.3006



DELIVERIES complete

10-15-12
[Signature]



[Signature]
10/15/2012

7th Flr
Copy

ILD 069 998 078

LAND AND CHEMICALS DIVISION

Type of Document: Notice of Violation and Inspection Report

Name of Document: Arkema Emulsion Systems

AUTHOR: *James Paulin* 7/1/13 *JPB*

APA:

SECTION CHIEF:

BRANCH CHIEF:

DIVISION APA:

DIVISION DIRECTOR:

OTHERS:

DRA:

RA:

RETURN TO: Jamie Paulin

PHONE: 61771

COMMENTS: N/A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 09 2013

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. William D. Pedersen
Senior Health, Environment and Safety Manager
Arkema Emulsion Systems
12840 South Pulaski Road
Alsip, Illinois 60803

Re: Notice of Violation
RCRA Compliance Evaluation Inspection – Arkema Emulsion Systems
EPA I.D. No.: ILD 069 998 078

Dear Mr. Pedersen:

On September 26, 2012, a representative of the U.S. Environmental Protection Agency inspected the Arkema Emulsion Systems (Arkema) facility, located at 12840 South Pulaski Road, Alsip, Illinois. The purpose of the inspection was to evaluate Arkema's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 *et seq.*, and its implementing regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the inspection report for your reference.

Based on information provided by Arkema personnel, a review of records, and personal observations made by the inspector at the time of the investigation, EPA has determined that Arkema is in violation of hazardous waste regulations in the Illinois Administrative Code (IAC) and in corresponding provisions in the United States Code of Federal Regulations (CFR), as specified below.

To be eligible for the exemption from having a hazardous waste storage permit, Arkema must be in compliance with the conditions of 35 IAC §§ 722.134(a) and (c); [40 CFR § 262.34(a) and (c)]. Based on the information currently available to us, we find that Arkema is not in compliance with the following conditions for a hazardous waste storage permit exemption, and violated the following requirements:

1. A generator of hazardous waste must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance. *See*, 35 IAC § 722.134(a)(4); 35 IAC § 725.116(b), (c) (d)(3) & (d)(4) [40 CFR § 262.34(a)(4); 40 C.F.R. § 265.16(b), (c), (d)(3) & (d)(4)].

At the time of the inspection, Arkema's training records did not include documentation showing that new employees completed the training program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste and did not include documentation that facility personnel took part in an annual review of the initial training required.

Arkema did not maintain a written description of the type and amount of both introductory and continuing training that was given to each person at the facility related to hazardous waste management.

Lastly, Arkema did not maintain records that documented the training or job experience, required, had been given to, and completed by, facility personnel.

2. A generator of hazardous waste must attempt to make arrangements to familiarize police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes. A generator of hazardous waste must also make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility. *See*, IAC § 722.134(a)(4); 35 IAC § 725.137(a)(4) [40 CFR § 262.34(a)(4); 40 CFR § 265.37(a)(4)].

Arkema had not made arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or releases at the facility.

3. A large quantity generator that accumulates hazardous waste on-site and does not meet the conditions for a permit exemption of 35 IAC § 722.134 and 40 C.F.R. § 262.34 is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. *See*, 35 IAC § 722.134(a) [40 C.F.R. § 262.34(a)].

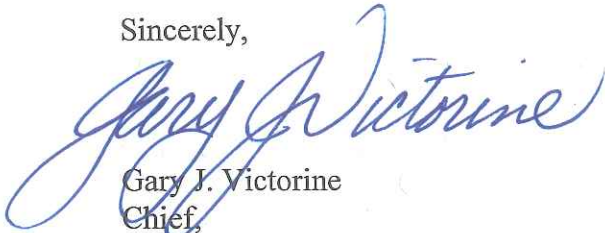
Upon failing to meet the conditions and requirements identified in item numbers 1 and 2, listed above, Arkema became an operator of a hazardous waste storage facility. Arkema has not applied for or received a hazardous waste storage permit nor does Arkema have interim status. Arkema's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC §§ 703.121 and 702.123 [adopting 40 C.F.R. §§ 270.1(c) and 270.10].

At this time, EPA is not requiring Arkema to apply for an Illinois hazardous waste storage permit, provided that Arkema immediately complies with the conditions for an exemption set forth in the regulations identified above.

Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violations and requiring compliance immediately or within a specified time period.

Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above requirements. You should submit your response to Jamie L. Paulin, U.S. Environmental Protection Agency, Region 5 (LR-8J), 77 West Jackson Boulevard, Chicago, Illinois 60604.

Sincerely,



Gary J. Victorine
Chief,
RCRA Branch

Enclosures

cc: Todd Marvel, Illinois Environmental Protection Agency (todd.marvel@illinois.gov)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Arkema Emulsion Systems

EPA ID No.: ILD 069 998 078

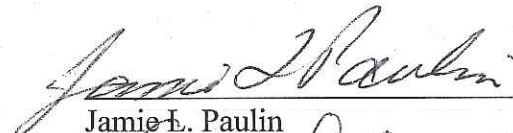
LOCATION ADDRESS: 12840 South Pulaski
Alsip, Illinois 60803

NAICS CODE(S): 325211 [Acetal Resins Manufacturing]

DATE OF INSPECTION: September 26, 2012

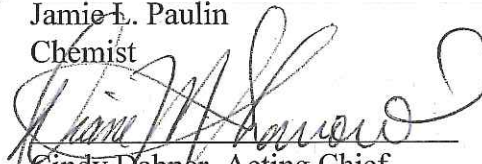
EPA INSPECTOR: Jamie L. Paulin
Chemist
LR-8J
Compliance Section 1
(312) 886-1771 Direct
(312) 353-4788 Facsimile
paulin.jamie@epa.gov

PREPARED BY:


Jamie L. Paulin
Chemist

7/1/13
Date

REVIEWED BY:


Cindy Dabner, Acting Chief
Compliance Section 1
RCRA Branch

7/18/13
Date

INTRODUCTION:

The purpose of the inspection was to conduct an un-announced Compliance Evaluation Inspection (CEI) at the Arkema Emulsion Systems (Arkema) facility, located at 12840 South Pulaski, Alsip, Illinois, to examine Arkema's management of its Resource Conservation and Recovery Act (RCRA) regulated waste, by the U.S. Environmental Protection Agency.

Arkema notified as a large quantity generator (LQG) on or about August 7, 1980. Arkema has fluctuated generator status since 1980 and was operating as an LQG at the time of the inspection. They re-notified as an SQG on or about November 30, 2012.

Arkema manufactures Latex. They have about 40 employees and operate four shifts, 24 hours per day. They have an Air Permit and a pH adjusting waste-water treatment method, discharging to the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC). They generate used fluorescent light bulbs, used oil, non-hazardous glycol waste, non-hazardous Latex product tank "clean-out," and task specific incident related hazardous waste, such as off-spec material.

OPENING CONFERENCE:

I entered the Arkema facility at 9:52 am on September 26, 2012. I spoke to the receptionist, who contacted Mr. William Pedersen, Senior Health, Environment and Safety Manager. During the opening conference, I presented my credentials to Mr. Pedersen and I provided him with a Small Business Resources Information Sheet and the Illinois Sustainable Solutions brochure. Mr. Pedersen did not make a CBI claim on the information gathered during the inspection or on the photos taken, documents copied and/or verbal information provided. The personnel that were in attendance at the opening conference are listed in *Table 1*.

Table 1. Personnel in Attendance during CEI at Arkema.

Personnel	Title	Department
William D. Pedersen	Senior Health, Environment and Safety Manager	Arkema
Jamie Paulin	Chemist	EPA RCRA Branch

Mr. Pedersen explained that Arkema is a Latex Manufacturer and explained to me that the waste generated on-site is task specific and incident related. For example, they shipped 75 x 55-gallon containers off-site for disposal since the material was over the expiration date and could not be used in their process. He also explained that they do generate used oil and used fluorescent light-bulbs on-site. According to Mr. Pedersen, Arkema's largest waste stream is waste latex and

material that is scraped out of various process tanks. Arkema puts the waste that is considered to be special waste in the State of Illinois into a roll-off for storage and disposal.

We began the physical site inspection immediately following the opening conference in the Testing laboratory.

SITE INSPECTION:

Mr. Pedersen escorted me on the physical inspection, which began in the Testing Laboratory. One 55-gallon container of waste latex was being stored in the laboratory. *See*, photograph 1.

We then continued to the outside (East side) of the facility to the hazardous waste storage unit. Two 55-gallon containers of material were being stored inside of the unit without any type of labeling. Mr. Pedersen explained that the containers were storing a non-hazardous glycol and water mix. Arkema did put non-hazardous labels on the containers before I left the facility. In addition to the two containers of non-hazardous material, one 55-gallon container of Used Oil was being stored in the unit. *See*, photographs 2 and 12.

One 55-gallon empty container and various containers of raw materials were also being stored in the unit. A sign with the words, "Hazardous Waste Storage," was positioned to the outside of the unit. The unit was also equipped with a "garage-type" door and the door was kept in a closed position. *See*, photographs 3 and 4.

I then inspected the Weigh-Off Area for raw materials. A drain and trench was located in the floor. Mr. Pedersen explained that the drainage leads to the waste water treatment tank, which is a pH adjust tank. *See*, photograph 5.

As we proceeded, I noticed a storm water run-off that was located on the North side of the property. Mr. Pedersen explained that the run-off discharges to the district. *See*, photograph 6.

Mr. Pedersen then escorted me to the North warehouse where the used florescent lightbulb storage was located. Veolia removes the light-bulbs off-site for disposal. The used light-bulbs were being stored properly at the time of the inspection. *See*, photograph 7.

From the North warehouse, I inspected the waste-water tank storage area. Mr. Pedersen stated that both acids and caustics are both used in the pH adjust treatment. *See*, photograph 8.

A retention tank was located on the South/West side of the property. Mr. Pedersen expressed that the retention tank was built in case of an emergency to collect any of the material stored on-site. The collected material and storm water can be treated via the waste-water treatment method. *See*, photograph 9.

To the West of the retention tank, the truck loading area was located. Arkema was storing a 55-gallon satellite accumulation area (SAA) container with secondary containment. The SAA container was storing waste flammable liquids from the buckets that were being used to collect drippings from the loading process and the connection to the trucks. *See*, photograph 10.

Lastly, Mr. Pedersen showed me where the special waste was being stored in a roll-off, located in the Filter Room. He explained that the special waste is collected as waste latex and product that was scraped out of the process equipment. *See*, photograph 11.

This area was the last area to be inspected. Once the site inspection was completed, I completed the records review inspection with Mr. Pedersen.

RECORDS REVIEW:

Mr. Pedersen aided me in the review of the hazardous waste records after completing the physical site inspection.

1. Personnel Training

It appeared that Arkema did not perform annual RCRA hazardous waste training. Mr. Norvell Barbour, Production Superintendent, showed me the electronic database for training.

- The training did contain an annual module for emergency operations.
- Waste management was performed every 36 months.
- SPCC training, DOT Training and Fire Safety Training were performed every 12 months.
- HazWoper was conducted every 36 months for workers who sign manifests.
- A basic orientation was being conducted for new employees; however, it did not contain RCRA training for employees that would be managing hazardous waste.

Even though, some of the elements were being conducted at separate times – the basic RCRA training program was not being performed on an annual basis. Mr. Barbour implemented this annual RCRA training into the electronic modules as of the date of the inspection.

2. Manifests

I reviewed the manifests of the hazardous waste shipments from 2010, 2011 and 2012. The manifest records appeared to be in order and were being properly stored at the facility.

3. Waste Analysis and Recordkeeping

I observed that Arkema did have, as a record on-site, a land disposal restriction (LDR) notification form for the shipments of hazardous waste.

4. Contingency Plan

An SPCC plan was available for my review during the inspection.

5. Preparedness and Prevention

Agreements with local emergency authorities and contractors were available for my review during the inspection. It appeared that Arkema did not make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility.

6. Annual Reporting

Arkema had filed an annual report with IEPA by March 1 for the reporting years of 2011. Prior to January 25, 2010, Dow Chemical was the owner of the company. After that date, Arkema became the owner. Mr. Pedersen did not have Dow Chemical records on-site since he is an employee of Arkema. They are currently listed as an SQG within the EPA's RCRAInfo database.

7. Weekly and Daily Inspections

It appeared, at the time of the inspection, that Arkema was conducting weekly inspections of the hazardous waste storage area.

CLOSING CONFERENCE:

I conducted the closing conference with Mr. Pedersen.

I explained to Mr. Pedersen that I would need to review my notes and photographs before making any compliance decisions. I did explain to him that the RCRA training program was not complete at the time that I was inspecting the training modules.

- The elements of the RCRA Training program were not included in their training program and not being conducted on an annual basis.
- The RCRA Training was not included within the orientation training for new employees.

Lastly, I explained to Mr. Pedersen that he would get a copy of my inspection report along with the photograph log.

I departed Arkema around 12:30pm.

ATTACHMENT: (1)

Attachment 1 Photographs taken during the time of the inspection.

ENCLOSURE: (1)

Photographs for Arkema Emulsion Systems

Media: RCRA

Disk Number 1
Photo Number 1
Photo Filename DSCN0475.jpg
Date/Time 9/26/2012
10:28:48 AM
Photographer Jamie Paulin

Description

Testing Laboratory. South/East of facility.
One 55-gallon container of latex.



Disk Number 1
Photo Number 2
Photo Filename DSCN0476.jpg
Date/Time 9/26/2012
10:32:34 AM
Photographer Jamie Paulin

Description

Hazardous waste storage unit. Two 55-gallon containers were being stored without labels. Arkema labeled them as non-hazardous Glycol and water. One 55-gallon container of Used Oil was being stored in the unit as well.



Photographs for Arkema Emulsion Systems

Media: RCRA

Disk Number 1
Photo Number 3
Photo Filename DSCN0477.jpg
Date/Time 9/26/2012
10:32:38 AM
Photographer Jamie Paulin

Description

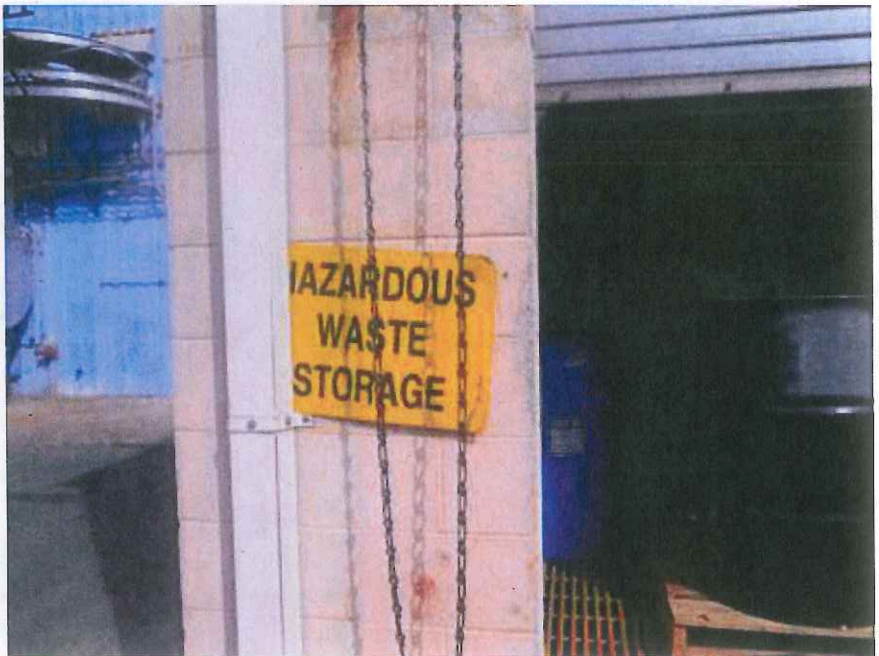
Hazardous waste storage unit. One 55-gallon empty container was being stored. Raw materials were also being stored in this location.



Disk Number 1
Photo Number 4
Photo Filename DSCN0478.jpg
Date/Time 9/26/2012
10:32:48 AM
Photographer Jamie Paulin

Description

The Hazardous waste storage unit was labeled with a sign including the words, "Hazardous Waste Storage." The unit also had a "garage-type" door and the door was kept in a closed position.



Photographs for Arkema Emulsion Systems

Media: RCRA

Disk Number 1
Photo Number 5
Photo Filename DSCN0479.jpg
Date/Time 9/26/2012
10:40:42 AM
Photographer Jamie Paulin

Description

Weigh-off Area. Drain and trench. Drain leads to the waste water treatment tank.



Disk Number 1
Photo Number 6
Photo Filename DSCN0480.jpg
Date/Time 9/26/2012
10:53:14 AM
Photographer Jamie Paulin

Description

North-side of property. Storm water run-off. The run-off discharges to the district.



Photographs for Arkema Emulsion Systems

Media: RCRA

Disk Number 1
Photo Number 7
Photo Filename DSCN0481.jpg
Date/Time 9/26/2012
10:56:32 AM
Photographer Jamie Paulin

Description

North warehouse. Used fluorescent lightbulb storage. Veolia removes the light bulbs for disposal.



Disk Number 1
Photo Number 8
Photo Filename DSCN0482.jpg
Date/Time 9/26/2012
11:03:26 AM
Photographer Jamie Paulin

Description

Waste water tank storage. Acids and caustics are both used.



Photographs for Arkema Emulsion Systems

Media: RCRA

Disk Number 1
Photo Number 9
Photo Filename DSCN0483.jpg
Date/Time 9/26/2012
11:10:14 AM
Photographer Jamie Paulin

Description

Retention tank, located on South/West side of property. The tank is to be used in case of an emergency. The collection will be treated via the WWTU.



Disk Number 1
Photo Number 10
Photo Filename DSCN0484.jpg
Date/Time 9/26/2012
11:15:18 AM
Photographer Jamie Paulin

Description

Satellite accumulation area (SAA) container. Waste flammable liquids stored at truck loading area. Buckets were used to collect drips from loading.



Photographs for Arkema Emulsion Systems

Media: RCRA

Disk Number 1
Photo Number 11
Photo Filename DSCN0485.jpg
Date/Time 9/26/2012
11:20:18 AM
Photographer Jamie Paulin

Description

Filter Room. Special waste was being stored in roll-offs.



Disk Number 1
Photo Number 12
Photo Filename DSCN0486.jpg
Date/Time 9/26/2012
11:21:34 AM
Photographer Jamie Paulin

Description

Hazardous waste storage unit. Non-hazardous labels were placed on unidentified 55-gallon containers.



Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.) SUBPART A: GENERAL	
722.111	Section 722.111 Hazardous Waste Determination Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	808.121(a)
722.112(a)	Section 722.112 USEPA Identification Numbers Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
722.120(a)	Section 722.120 General Requirements Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
722.121(a)	Section 722.121 Acquisition of Manifests Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
722.122	Section 722.122 Number of Copies Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
.130	Is there any hazardous waste ready for transport off-site? Yes _____ No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(722.134(a))	Section 722.134 Accumulation Time Has the generator complied with the following requirements: Yes _____ No <u>2</u> N/A _____	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes _____ No <u>2</u> N/A _____	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows: Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No _____ N/A _____ If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	Has the generator closed an accumulation area? Yes _____ No <input checked="" type="checkbox"/> N/A _____	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
5.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>COMMENTS:</p>	
(725.278)	<p>Section 725.278 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Comments:</p> <p>Does the generator accumulate and/or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If "No", go to Subpart C.</p> <p>SUBPART J: TANK SYSTEMS</p> <p>Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.211
(725.211) (725.214)		725.214
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____ Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or</p> <p>if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____ placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A _____ provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____ sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____ <p>and</p> <p>is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> a liner (external to the tank); or a vault; or a double-walled tank; or an equivalent device (approved by the Board)? Yes _____ No _____ N/A _____	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) overfill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p>Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____</p> <p>Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A _____</p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A _____</p> <p>- Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with? Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p>Section 725.302 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A _____</p> <p>Comments:</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>Is the list of emergency equipment up-to-date?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <p>a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>b) submitted to:</p> <ul style="list-style-type: none"> - police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <p>a) regulations are revised? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 2 N/A <input checked="" type="checkbox"/></p> <p>b) the plan fails in an emergency? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 2 N/A <input checked="" type="checkbox"/></p> <p>c) the facility changes in a way that modifies the emergency response necessary? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 2 N/A <input checked="" type="checkbox"/></p> <p>d) information regarding emergency coordinators changes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 2 N/A <input checked="" type="checkbox"/></p> <p>e) information regarding equipment changes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> 2 N/A <input checked="" type="checkbox"/></p>	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Note: If the facility has had a release, explain in detail.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training Does the facility have a training program? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - key parameters for automatic waste feed cut-off systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - communications or alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to fire or explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to groundwater contamination incidents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - shutdown of operations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
728.107(a)(5))	<p>Section 728.107 Waste Analysis and Recordkeeping</p> <p>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
722.134(c)	<p>Section 722.134 Satellite Accumulation</p> <p>Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
722.134(g)	<p>Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.</p>	
	<p>SUBPART D: RECORDKEEPING AND REPORTING</p>	
722.140(a)	<p>Section 722.140 Recordkeeping</p> <p>Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(a)
722.140(b)	<p>Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(b)
722.140(c)	<p>Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	722.140(c)
722.140(d)	<p>Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.140(d)
722.141(a)	<p>Section 722.141 Annual Reporting</p> <p>Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes _____ No _____ N/A _____</p>	722.141(a)
	<p>Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.141
722.142(a)(1)	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(2)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.143
722.150	SUBPART E: EXPORTS OF HAZARDOUS WASTE Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.150
722.160	SUBPART F: IMPORTS OF HAZARDOUS WASTE Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.160
722.170	SUBPART G: FARMERS Is the generator a farmer? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> COMMENTS:	722.170

ATTACHMENT: (1)

Attachment 1 Photographs taken during the time of the inspection.

ENCLOSURE: (1)

Photographs for Arkema Emulsion Systems

Media: RCRA

Disk Number 1
Photo Number 1
Photo Filename DSCN0475.jpg
Date/Time 9/26/2012
10:28:48 AM
Photographer Jamie Paulin

Description

Testing Laboratory. South/East of facility.
One 55-gallon container of latex.



Disk Number 1
Photo Number 2
Photo Filename DSCN0476.jpg
Date/Time 9/26/2012
10:32:34 AM
Photographer Jamie Paulin

Description

Hazardous waste storage unit. Two 55-gallon containers were being stored without labels. Arkema labeled them as non-hazardous Glycol and water. One 55-gallon container of Used Oil was being stored in the unit as well.



Photographs for Arkema Emulsion Systems

Media: RCRA

Disk Number 1
Photo Number 3
Photo Filename DSCN0477.jpg
Date/Time 9/26/2012
10:32:38 AM
Photographer Jamie Paulin

Description

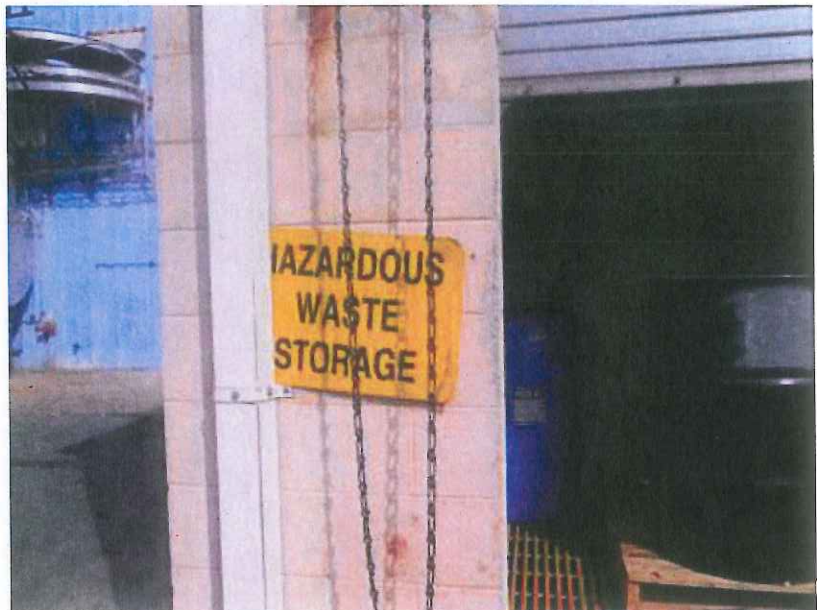
Hazardous waste storage unit. One 55-gallon empty container was being stored. Raw materials were also being stored in this location.



Disk Number 1
Photo Number 4
Photo Filename DSCN0478.jpg
Date/Time 9/26/2012
10:32:48 AM
Photographer Jamie Paulin

Description

The Hazardous waste storage unit was labeled with a sign including the words, "Hazardous Waste Storage." The unit also had a "garage-type" door and the door was kept in a closed position.



Photographs for Arkema Emulsion Systems

Media: RCRA

Disk Number 1
Photo Number 5
Photo Filename DSCN0479.jpg
Date/Time 9/26/2012
10:40:42 AM
Photographer Jamie Paulin

Description

Weigh-off Area. Drain and trench. Drain leads to the waste water treatment tank.



Disk Number 1
Photo Number 6
Photo Filename DSCN0480.jpg
Date/Time 9/26/2012
10:53:14 AM
Photographer Jamie Paulin

Description

North-side of property. Storm water run-off. The run-off discharges to the district.



Photographs for Arkema Emulsion Systems

Media: RCRA

Disk Number 1
Photo Number 7
Photo Filename DSCN0481.jpg
Date/Time 9/26/2012
10:56:32 AM
Photographer Jamie Paulin

Description

North warehouse. Used fluorescent lightbulb storage. Veolia removes the light bulbs for disposal.



Disk Number 1
Photo Number 8
Photo Filename DSCN0482.jpg
Date/Time 9/26/2012
11:03:26 AM
Photographer Jamie Paulin

Description

Waste water tank storage. Acids and caustics are both used.



Photographs for Arkema Emulsion Systems

Media: RCRA

Disk Number 1
Photo Number 9
Photo Filename DSCN0483.jpg
Date/Time 9/26/2012
11:10:14 AM
Photographer Jamie Paulin

Description

Retention tank, located on South/West side of property. The tank is to be used in case of an emergency. The collection will be treated via the WWTU.



Disk Number 1
Photo Number 10
Photo Filename DSCN0484.jpg
Date/Time 9/26/2012
11:15:18 AM
Photographer Jamie Paulin

Description

Satellite accumulation area (SAA) container. Waste flammable liquids stored at truck loading area. Buckets were used to collect drips from loading.



Photographs for Arkema Emulsion Systems

Media: RCRA

Disk Number 1
Photo Number 11
Photo Filename DSCN0485.jpg
Date/Time 9/26/2012
11:20:18 AM
Photographer Jamie Paulin

Description

Filter Room. Special waste was being stored in roll-offs.



Disk Number 1
Photo Number 12
Photo Filename DSCN0486.jpg
Date/Time 9/26/2012
11:21:34 AM
Photographer Jamie Paulin

Description

Hazardous waste storage unit. Non-hazardous labels were placed on unidentified 55-gallon containers.



ARKEMA INC.
ALSIP, ILLINOIS

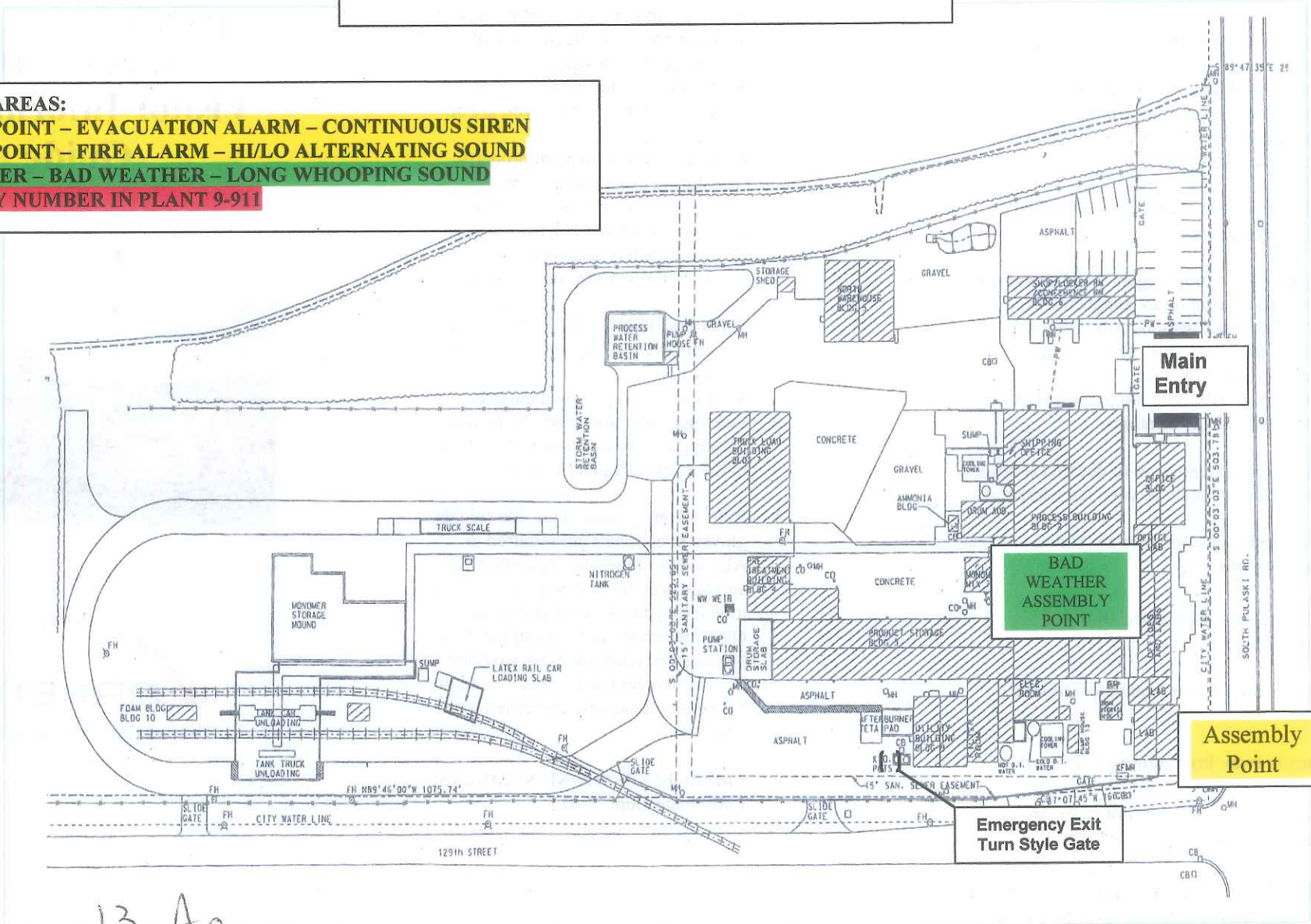
ASSEMBLY AREAS:
ASSEMBLY POINT – EVACUATION ALARM – CONTINUOUS SIREN
ASSEMBLY POINT – FIRE ALARM – HI/LO ALTERNATING SOUND
BAD WEATHER – BAD WEATHER – LONG WHOOPING SOUND
EMERGENCY NUMBER IN PLANT 9-911

ASSEMBLY AREAS:
ASSEMBLY POINT – EVACUATION ALARM – CONTINUOUS SIREN
ASSEMBLY POINT – FIRE ALARM – HI/LO ALTERNATING SOUND
BAD WEATHER – BAD WEATHER – LONG WHOOPING SOUND
EMERGENCY NUMBER IN PLANT 9-911

ASSEMBLY AREAS:
ASSEMBLY POINT – EVACUATION ALARM – CONTINUOUS SIREN
ASSEMBLY POINT – FIRE ALARM – HI/LO ALTERNATING SOUND
BAD WEATHER – BAD WEATHER – LONG WHOOPING SOUND
EMERGENCY NUMBER IN PLANT 9-911

ASSEMBLY AREAS:
ASSEMBLY POINT – EVACUATION ALARM – CONTINUOUS SIREN
ASSEMBLY POINT – FIRE ALARM – HI/LO ALTERNATING SOUND
BAD WEATHER – BAD WEATHER – LONG WHOOPING SOUND
EMERGENCY NUMBER IN PLANT 9-911

ASSEMBLY AREAS:
ASSEMBLY POINT – EVACUATION ALARM – CONTINUOUS SIREN
ASSEMBLY POINT – FIRE ALARM – HI/LO ALTERNATING SOUND
BAD WEATHER – BAD WEATHER – LONG WHOOPING SOUND
EMERGENCY NUMBER IN PLANT 9-911



13 Acres

GENERAL SAFETY PRECAUTIONS:

Smoking is allowed only in designated areas. Smoking is only allowed at the far end of the parking lot.

Weapons, illegal drugs & alcohol are prohibited on the plant site. No person under the influence of an illegal drug or alcohol is allowed on the plant site.

Map on reverse side shows evacuation/bad weather assembly areas.

Cellular phones, radios, pagers and cameras are not permitted in plant areas designated as hazardous locations without prior approval of the Plant Manager. Only such devices documented (by UL, FM or equal) as intrinsically safe are permitted in designated hazardous locations.

Injuries, illness, or exposure to chemicals must be reported immediately to your site contact.

No food, drinks, or cosmetics are allowed in any plant working area.

Handrails must be used when climbing or descending stairs.

Avoid touching pipes or equipment unless specified.

Keep hands away from moving machinery.

Watch out for forklifts and foot traffic in warehouse, production and yard areas.

The Alsip facility contains hazardous chemicals in areas such as the monomer storage mound and ammonia building. All chemical containers are properly labeled.

1. **ENTERING THE PLANT:** Visitors will enter and exit the plant by way of the main entrance. Please obey the posted speed limit signs. Your Arkema site contact will be responsible for you while you are on the plant site. Walk, do not run, on plant property, even during evacuation. Some surfaces may be uneven or curbed. Make yourself knowledgeable about local exits, safety showers, and eyewash station near your worksite.
2. **SIGN IN/SIGN OUT PROCEDURE:** All visitors must sign in at the main office. Visitors must sign in and out each time they enter and leave the facility. This log is used to account for visitors in the event of a plant evacuation.
3. **PPE:** Safety glasses with side shields, gloves & hard hats are required in ALL areas of the plant (except offices and lunchrooms) and will be provided to you by your Arkema site contact. Other necessary safety equipment (i.e hearing protection) will be provided by your Arkema site contact based on the potential hazards associated with your visit.
4. **EMERGENCY PHONE NUMBERS:** Fire/Police Dept. 9-911

ARKEMA 12840 S. Pulaski Road Alsip, IL 60803 **Visitor Information Guide**



THE ORIGINAL
MARBLE COVER-36 SHEETS

NAME

Artema Emulsion Sys
12840 S. Pulaski
Alsip, IL 60803
IL D' 069 998 078

WIDE RULED
ROARING SPRING, PA 16673



William D. Pedersen
Senior Health, Environment
and Safety Manager

Arkema Emulsion Systems
12840 S. Pulaski Road
Alsip, IL 60803
Office: 708-396-3006
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Norvell Barbour
Production Superintendent

Arkema Emulsion Systems
12840 S. Pulaski Road
Alsip, IL 60803
Tel.: 708-396-3053
norvell.barbour@arkema.com
www.arkema-inc.com

9:52 AM Spoke w Receptionist
9/26/12

ETS Manager William Peterson

Arkema - Resins

→ Made to wait → 10 minutes or so →

→ Latex Manufactures →
Shawin Williams

Waste Management

Special Waste - Waste Latex
Land filled → Roll-off
→ skins - filts

Product - Scrape out
Put in dumpster - absorbent

- Monomers - styrene

- dy disconnects

SAA
→ minute

11 - 55 gal drums

2) 55 gal - once per year

3) - Waste generated - task specific
- incident related

Used Oil
55 gal drums - oil

4) Block shed

Vehicle - come out }
Falls - Sauget - }
Noname
Sauget,
West Conlton

After Burner -
Scrubber Unit

7-9 drums
per year }
TETA solution
change every 6-7 years

Raw
material

One bin to drums disposal -
↳ one expiration date
so we disposed of it

~~FBSOP~~ Air Permit
Is Ant. of stuff - lower

- No WHTU →

- discharge to MWRO GC

pH adjusting

↳ use H₂O from trucks
↳ WW tanks →

pH adjust →

↳ Used light bulbs ↗ Vision
- Batteries ↘

325211

Acetal
Nursing
MPC

- Description { Training Menu
- ↳ Electronic Data base
 - ↳ Training documents
 - ↳ 2 types of training
 - ↳ General Awareness
 - ↳ Contingency Plan - SPCC
 - ↳ Annual Reports
 - Inspections of Storage Area
 - ↳ Ankema - Parent Co. French Co.
 - US HQ King of Prussia, PA
 - ↳ - 40 employees
 - 24 hr day
 - 4 shifts [12hr shifts]

→ Truck loads - of Product.

↳ Latex - Just latex
- 50% 120
50% Latex

↳ Latex

Photo Log

1) Latex 55-gal drum
Testing Lab

2) 255 x gal Next Labels → ^{gen} Shut down
3) 135 Used Oil → Glycol/
4) 1 Blue Empty → H₂O
- Empty → drain
- Raw Material → lines
→ new filler
Glycerol

5) drain - Weigh-off Area

6) Run-off North side of Pipes

7) Ventilation - #2 light

Bulk/Baltes
Next Warehouse

Donald Milton

→ 35-40 years
→ Cook Dist of Em.
County

→ Peter Dumas

→ Keep Retain Samples

→ Em. Drop Weekly

→ Radio - Used to call
Greg Phares.

Spill kit

→ Drains go to WW Tank,
3 outfalls

8) WU Tanks
- acid
- Canister

a) retention tank → in case
of emergency - gravity into
smaller pit 1st - then into
big pit
→ then treat

~~10)~~ 5A Waste Flare basin
to bucket to be used
to catch drops

11) Special Waste - filter room
absorbent Roll-off

→ 3 Out falls
→ discharges to district.
Outfall GA
Permit
Discharge
authorization

→ some volatile -
→ volatile -

→ suspended solids

→ Drains - Slats -

→ back to tank

Virgin Schedule Activities
Considerations

→ caustic solution } caustic
→ rinsing lines } holding tank
→

12) Put Non-Lag labels
on the Namdag Waste

run →

Waste

→ Gravity Fed
→ Sewer system to LW Tanks

3 reactors

2, 5, 6

run → later Bulk Monomers
hand piped

Batch Process

↳ Cooling Tank per reactor
↳ Blend Tank

↳ Began Reactor

- lift station - lift

↳ Water to dock
↳ from 2nd to LW tanks

- Rain H_2O

→ Mosquito Creek

Creek - discharges - to East

↳ runs behind Co. - MWRDGC

↳ run-off - to Mosquito
Creek - North Side

→ from safety tank

↳ to retention - run-off

Indur

SPC

NPD

Nth

Records Review

SPCC Plan -

NPDOS Permits ILR00

→ Later

monitors + Surfactant + H₂O
inhalers

→ Fris Dept. - create site to know
↳ Policy - what's on site

↳ Copy of Tier II

Cook County - } copy Tier II
LEPC

Nothing
to hospitals

Weekly Hg Waste Insp.
List - Good

Annual - 2011 - Just 2011
Hg Waste Reports ~~2010~~ Dow-Chemical

[Jan 25 2010]
[Arkema]

Dow used to
own company prior to
Jan 25, 2010

Manifests 000353504 UBS
D001 3/7/10

Manifests → Good

Harrell Barham - Prodestus
↳ Superintendent

→ Training Plan
↳ identity - electronically
↳ assignment

Cruising operations annually

Waste Audit - 36 months
↳ SPCC - 12 months
DOT
- Fire annually
-

Age 18 open [36 months]
↳ workers - who can
manifest

RERA Training } Will be
integration into
training

↳ Orientation - When break
↳ Need to add RERA

↳ They have parts but not all
↳

job titles
work
descriptions
work duties

→ they do have job titles
job duties
- etc.

ReRA Training implemented
today 9/26/12

CAP -